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BY ECF

Hon. James C. Francis, IV
United States Magistrate Judge
United States District Court
500 Pearl Street
New York, New York 10007

Re: Mark Nunez v. City of New York, et al., 11-CV-5845 (LTS) (JCF)

Your Honor:

We write jointly with plaintiffs' counsel in order to request an additional three-week extension of the stay of all Court-ordered deadlines related to class issues granted by Your Honor on July 21, 2014 (DE 147). If granted, this request would extend the stay from August 1, 2014 through August 22, 2014. The purpose of this request for an extension is to continue the good-faith negotiations between the parties with respect to a possible resolution of key issues regarding the claims brought on behalf of the plaintiff class. The parties have continued to exchange additional drafts of a proposed memorandum of understanding ("MOU"), and have had both telephonic and in-person discussions to further negotiations regarding the proposed MOU. The parties are scheduled to confer again next week regarding certain outstanding key issues that must be resolved prior to signing an MOU. We are hopeful that the parties can agree on its terms and move forward with substantive settlement discussions. We thank Your Honor in advance for considering this request.

Respectfully submitted,

/s/

Kimberly M. Joyce
Assistant Corporation Counsel

cc: All Counsel (by ECF)